

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

IN RE:	)	BANKRUPTCY CASE NO.: 19-16903
	)	
URBAN V LEE	)	CHAPTER 13 PROCEEDING
JANICE M LEE	)	
	)	JUDGE ARTHUR I HARRIS
DEBTOR(S)	)	
	)	<b><u>OBJECTION TO PROOF OF CLAIM #3 FILED</u></b>
	)	<b><u>BY THE INTERNAL REVENUE SERVICE</u></b>

Now come the Debtors, Urban and Janice Lee, by and through counsel, and hereby object to the Proof of Claim No. 3 filed by the Internal Revenue Service for the following reasons:

1. The Internal Revenue Service has filed a claim asserting Debtors have failed to file taxes for the calendar year of 2016.
2. The sum total of priority taxes and interest the creditor claims is due and owing for said year is \$28,056.45, which is the largest percentage of Debtors' priority tax obligation in said proof of claim.
3. The Debtors have filed Income Tax Form 1040 for 2016 and will re-submit it for review by the Internal Revenue Service.
4. The Debtors believe any tax liability owed to the IRS will be significantly reduced by the aforesaid filing.
5. In the alternative, if the instant Objection is not granted, Debtors would request a continuance to amend their schedules and plan to reflect any amendments if necessary.

Wherefore based on the foregoing, the Debtors move this Honorable Court to grant their Objection to the Proof of Claim No. 3 filed by the Internal Revenue Service.

Respectfully submitted,

**J.P. AMOURGIS & ASSOCIATES**

/s/ Y. Eric Holtz

Y. Eric Holtz (0084326)

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**CERTIFICATE OF SERVICE**

I certify that on January 18, 2020 a true and correct copy of the foregoing was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Lauren A Helbling served electronically
- United States Trustee served electronically

And by regular U.S. mail, postage prepaid, on:

Internal Revenue Service  
Centralized Insolvency Operation  
PO Box 7346  
Philadelphia, PA 19101-7346

Internal Revenue Service -Insolvency Group 6  
1240 E. 9<sup>th</sup> Street, Room 493  
Cleveland, OH 44199

Office of the United States Attorney  
Attn: Civil Process Clerk  
Carl B. Stokes United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, Ohio 44113-1852

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/s/ Y. Eric Holtz

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